

# **EXHIBIT B**

**The Amazon Insider Defendants' Role in the Scheme**

1. **Noah Page:** Noah Page began his employment with Amazon as a fulfillment center associate in Chattanooga, Tennessee in January 2023. REKK recruited Noah Page to facilitate returns fraud and Noah Page agreed to approve customer returns for products that were not in fact returned. In April 2023, Noah Page fraudulently approved product returns for 56 orders, causing Amazon to refund over \$75,000 to REKK users. REKK paid Noah Page at least \$5,000 via interstate electronic financial transactions for his participation in the unlawful scheme. REKK and Noah Page's communications were conducted via interstate electronic telegraph channels and text messages.

2. **Luke Colvin:** Luke Colvin began his employment with Amazon as a fulfillment center associate in Chattanooga, Tennessee in January 2021. REKK recruited Luke Colvin to facilitate returns fraud and Luke Colvin agreed to approve customer returns for products that were not in fact returned. REKK and Luke Colvin's communications were conducted via interstate electronic Telegraph channels. In March 2023, Luke Colvin fraudulently approved returns for 64 orders at REKK's request, causing Amazon to refund REKK users over \$109,000. REKK paid Luke Colvin \$5,200 via interstate electronic financial transactions for his participation in the unlawful scheme.

3. **Skylar Robinson:** Skylar Robinson began his employment with Amazon as a fulfillment center associate in Lexington, Kentucky in June 2022. REKK recruited Skylar Robinson to facilitate returns fraud and Skylar Robinson agreed to approve customer returns for products that were not in fact returned. REKK and Skylar Robinson's communications were conducted via interstate electronic Telegraph channels. From January through May, 2023, Skylar Robinson fraudulently approved returns for 189 orders, causing Amazon to refund REKK users over \$175,000. On information and belief, REKK paid Robison an amount presently unknown to Amazon via interstate electronic financial transactions for his participation in the unlawful scheme.

1           4.     **Alejandro Taveras:** Alejandro Taveras began his employment with Amazon as  
2 a fulfillment center associate in Avenel, New Jersey, in June 2022. REKK recruited Alejandro  
3 Taveras to facilitate returns fraud and Alejandro Taveras agreed to approve customers returns for  
4 products that were not in fact returned. REKK and Alejandro Taveras' communications were  
5 conducted via interstate electronic Telegraph channels. From January through April, 2023,  
6 Alejandro Taveras fraudulently approved returns for 52 orders, causing Amazon to refund  
7 REKK users over \$67,000. REKK paid Alejandro Taveras an amount presently unknown to  
8 Amazon via interstate electronic financial transactions for his participation in the unlawful  
9 scheme.